

1 WILLIAM D. CONNELL, Cal. State Bar No. 89124
bconnell@gcalaw.com
2 SALLIE KIM, Cal. State Bar No. 142781
skim@gcalaw.com
3 GCA LAW PARTNERS LLP
1891 Landings Drive
4 Mountain View, CA 94043
(650) 428-3900
5 (650) 428-3901 [fax]

6 Attorneys for Defendants QAD Inc., John Doordan,
7 Lai Foon Lee, and William D. Connell
8
9

10 UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
12 [San Francisco Division]

13 MANI SUBRAMANIAN, as an individual
14 etc.,

15 Plaintiff,

16 vs.

17 ST. PAUL FIRE AND MARINE
INSURANCE COMPANY, et al. (including
18 QAD INC., a Delaware Corporation with
principal place of business in California; JOHN
19 DOORDAN, an individual and citizen of
California; LAI FOON LEE, an individual and
20 citizen of California; ROLAND DESILETS, an
individual and citizen of New Jersey; and,
21 WILLIAM D. CONNELL, an individual and
citizen of California),

22 Defendants.
23

Case No. 08-cv-1426-VRW [ECF]

Date: October 9, 2008

Time: 2:30 p.m.

Dept: Courtroom 6

Judge: Hon. Vaughn R. Walker

24 **NOTICE OF JOINDER BY DEFENDANTS**
25 **QAD INC., WILLIAM D. CONNELL, JOHN DOORDAN, AND LAI FOON LEE**
26 **IN MOTIONS OF DEFENDANTS RANDALL WULFF, ST. PAUL FIRE & MARINE**
27 **INSURANCE COMPANY, AND GREENAN, PFEFFER, SALLANDER & LALLY LLP**
28 **TO STRIKE COMPLAINT PURSUANT TO SECTION 425.16, CALIFORNIA CODE OF**
CIVIL PROCEDURE, [CALIFORNIA'S "ANTI-SLAPP" LAW]

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, on October 9, 2008, at 2:30 p.m., or as soon thereafter as the matter may be heard, before The Hon. Vaughn R. Walker, in Courtroom No. 6, on the 17th Floor, United States District Courthouse, 450 Golden Gate Avenue, San Francisco, California 94102, defendants QAD INC., JOHN DOORDAN, LAI FOON LEE, and WILLIAM D. CONNELL (collectively "QAD-Related Defendants") will and hereby do join in the Motions filed with the Court in the above-captioned matter by Defendants Randall Wulff, St. Paul Fire & Marine Insurance Company, and Greenan, Pfeffer, Sallander & Lally LLP, for an Order Striking the Complaint, and each and every cause of action therein, on the basis of Section 425.16, California Code of Civil Procedure and the grounds that all activities alleged therein with respect to the QAD-Related Defendants, and each of them, within any relevant periods of statute of limitations, are protected speech in connection with litigation under Section 425.16, and Plaintiff's allegations fail to show a probability that he will prevail on the merits, as set forth in the Motions to Dismiss filed by the QAD-Related defendants.

The QAD-Related Defendants make this Joinder based on this Notice, the Memoranda of Points and Authorities and Requests for Judicial Notice filed by the QAD-Related Defendants in support of their Motion to Dismiss under FRCP Rule 12(b)(6), as well as the Memoranda filed by defendants Randall Wulff and St. Paul concurrently herewith, the Complaint on file herein, and such further matters and argument, oral or written, as the Court may entertain at the hearing hereof.

Dated: August 4, 2008

WILLIAM D. CONNELL
SALLIE KIM
GCA LAW PARTNERS LLP

By: William D. Connell.
William D. Connell

By: Sallie Kim.
Sallie Kim

Attorneys for Defendants QAD Inc.,
John Doordan, Lai Foon Lee, and
William D. Connell